

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE FLINT WATER LITIGATION

Case No. 5:16-cv-10444-JEL-MKM
Hon. Judith E. Levy

This Document Relates To:

Gaddy et al. v. Flint et al.

Meeks et al. v. Flint et al.

Case No. 5:17-cv-11166-JEL-MKM

Case No. 5:17-cv-11165-JEL-MKM

**VNA’S ONE PAGE EXPLANATION REGARDING EXHIBIT G TO THE
MOTION TO SUPPLEMENT THE RECORD (ECF 908)**

Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (VNA) provide this explanation of Exhibit G pursuant to ECF No. 985. At the January 21, 2022 Motions in Limine hearing, VNA requested permission to make an additional submission regarding Plaintiffs’ MIL to Exclude Evidence of Alternative Causes, and the Court responded: “I think a one to two-page bullet point summary of what you think and what cases I should look at. That’s what I would welcome with both sides.” (ECF 646, PageID43470-71). In response, VNA submitted Exhibit G to the Court via e-mail on January 28, 2022. The Court’s Opinion and Order on the MIL refers to this submission. (ECF No. 702, PageID.45664). Because the substance of VNA’s supplemental submission was not covered on the record at any hearing or in any other filing, and was specifically referenced in the Court’s Opinion and Order, it is appropriate that Exhibit G be placed on the docket.

Respectfully submitted,

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Veolia Water North America Operating Services, LLC*

Dated: September 22, 2022

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2022, I electronically filed the foregoing Motion with the Clerk of the Court using the ECF System, which will send notification to the ECF counsel of record.

/s/ Alaina N. Devine
Alaina N. Devine